



November 28, 2006

Mr. Everett Wilson, Acting Co-Chair  
Aquatic Nuisance Species Task Force  
Acting Assistant Director – Fisheries & Habitat Conservation  
US Fish and Wildlife Service  
4401 North Fairfax Drive  
Arlington VA 22203

Via Email: [NZmudsnailPlan@fws.gov](mailto:NZmudsnailPlan@fws.gov)

**Re: FR Doc. E6-17403 - National Management and Control Plan for the New Zealand Mudsnail Draft**

Dear Mr. Wilson:

The National Aquaculture Association (NAA), an aquaculture industry trade association representing a diversity of domestic farm raised fin and shellfish interests, offers the following comments on the National Management and Control Plan for the New Zealand Mudsnail.

NAA commends the New Zealand Mudsnail Management and Control Plan Working Group on an excellent overview of New Zealand Mudsnail (NZMS) biology and ecology. We do, however, have a few concerns and comments about the treatment of aquaculture in the draft plan and about the threats to aquaculture from the response to the NZMS issue.

The executive summary of the draft plan states that, “. . . the western U. S. clones came from the commercial movement of aquaculture products such as trout eggs or live fish from Australia or New Zealand.” Since this statement is not documented and is only speculation, no positive purpose is served by stating it in the executive summary.

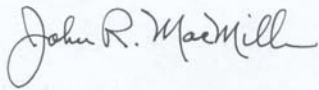
NAA is concerned that the plan may result in aquaculture operations becoming victims of the spread of NZMS by other vectors, and then being asked to bear a disproportionate share of the cost of control.

The plan lists fish hatcheries and associated stocking activities as the first priority in the list of vectors and pathways of spread. NZMS are found throughout the western U. S. in waters frequented by fly fishermen and at prime fly fishing locations, strongly indicating that anglers are the primary vector for spread. Yet the draft plan mentions angling as a vector only as part of a larger group of “recreational water users.” NAA recommends that angling be recognized specifically as the highly important vector or pathway of spread that it appears to be.

Angler transfer of NZMS to the immediate vicinity of fish farms has resulted in regulatory restrictions and serious economic impacts to aquaculture operations in Colorado and California. NAA encourages more effort to prevent movement of NZMS by anglers and boaters from infected areas and especially from “hot spots.” Regulations may be required to mandate proper cleaning and disinfection of angling gear, waders, and flotation equipment.

NAA encourages its membership to join with other stakeholders in efforts to prevent the spread of all invasive species. However, fish farmers should not be punished if they become victims of an infestation.

Sincerely,

A handwritten signature in black ink on a light blue background. The signature reads "John R. MacMillan" in a cursive script.

John R. MacMillan, Ph.D.  
President

JRM:ml